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#### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

INVENTOR(S)

Dale T. Platteter, et al.

TITLE

SYSTEM ARCHITECTURE AND METHOD FOR SYNCHRONIZATION OF REAL-TIME CLOCKS IN A DOCUMENT PROCESSING

SYSTEM

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## TRANSMITTAL OF APPEAL BRIEF UNDER 37 C.F.R.§1.192

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Respectfully submitted,

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# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES

In re the Application of

Dale T. Platteter, et al.

Application No.: 09/938,237

Filed: August 23, 2001

Docket No.: A0A73-US-NP

Examiner: Tse W. Chen

XERZ 2 00424

For: SYSTEM ARCHITECTURE AND METHOD FOR SYNCHRONIZATION OF

REAL-TIME CLOCKS IN A DOCUMENT PROCESSING SYSTEM

#### **BRIEF ON APPEAL**

Appeal from Group 2116

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Application No. 09/938,237



APR 2 8 2005

The real party in interest for this appeal and the present application is Xerox Corporation, by way of an Assignment recorded in the U.S. Patent and Trademark Office at Reel 012130, Frame -0717.

## II. STATEMENT OF RELATED APPEALS AND INTERFERENCES

There are no prior or pending appeals, interferences or judicial proceedings, known to Appellant, Appellant's representative, or the Assignee, that may be related to, or which will directly affect or be directly affected by or have a bearing upon the Board's decision in the pending appeal.

III. STATUS OF CLAIMS

Claims 1-21 are on appeal.

Claims 1-21 are pending.

## IV. STATUS OF AMENDMENTS

A Response After Final Rejection was filed by appellants on February 28, 2005. By an Advisory Action dated March 14, 2005, the Examiner indicated that the reply failed to place this application in condition for allowance.

#### V. SUMMARY OF CLAIMED SUBJECT MATTER

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The claims of this patent application do not stand or fall together. Each claim is to be considered by the Board in view of the arguments and comments submitted herein.

The subject matter of independent claim 1 is directed to a document processing system, as shown in FIGS. 1-4 and described on pages 8-11 of the specification. The system comprises a marking engine 10 that marks a sheet to form at least a portion of a document, the marking engine including a controller 22, the controller including a master clock 48 and logic for generating a discrete clock synchronization interrupt signal; a resource (12, 14, 16 or 18) that transfers the sheet to the marking engine or receives the sheet from the marking engine, the resource including a slave clock 42 related to operational timing of the resource and circuitry for receiving and processing the discrete clock synchronization interrupt signal; and a control bus 36 interconnecting the resource and the controller, for distributing the discrete clock synchronization interrupt signal.

Claim 2 adds the feature of the resource circuitry including a processor for determining the compatibility of the slave clock with the master clock.

Claim 3 adds the feature of the resource circuitry including a processor for adjusting the slave clock to provide for compatibility with the controller.

Claim 4 adds the feature of the compatibility between the resource and the controller providing hard real-time service.

Claim 5 adds the feature of the compatibility between the resource and the controller being such that the slave clock is synchronized to within one (1) clock cycle of the master clock.

Claim 6 adds the features of a plurality of resources, each resource including a slave clock related to operational timing of the resource and circuitry for receiving

and processing the discreet clock synchronization interrupt signal, and wherein the control bus interconnects each resource with the controller thereby distributing the discreet clock synchronization interrupt signal to each resource.

Claim 7 adds the feature of the circuitry in each resource including a processor for adjusting the slave clock associated with the resource to provide for compatibility with the controller.

Claim 8 adds the feature of the compatibility between the resources and the controller providing hard real-time service.

Claim 9 adds the feature of the compatibility between the resources and the controller being such that each slave clock is synchronized to within one (1) clock cycle of the master clock.

Claim 10 adds the feature of the resources including one or more finishing devices.

Claim 11 adds the feature of the resources including one or more feeding devices.

Claim 12 adds the feature of a 10 base T network for interconnecting the resources and the controller.

As shown in FIG. 5 and described on pages 11-12 of the specification, the subject matter of independent claim 13 is directed to method of initially synchronizing the slave clock with the master clock in a document processing system. The document processing system comprises a marking engine 10 that marks a sheet to form at least a portion of a document, the marking engine further including a controller 22, the controller further including a master clock 48, a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine, the resource further including a slave clock 42 related to operational timing of the resource, and electrical interconnections connecting the

resource to the controller, the electrical interconnections further including a control bus 36 and a network.

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The method of claim 13 comprises the steps of: (a) saving a value of the master clock in the controller (520); (b) generating a discrete clock synchronization interrupt signal in the controller and distributing the discrete clock synchronization interrupt signal to the resource via the control bus (525); (c) receiving the discrete clock synchronization interrupt signal at the resource (530) and saving a first value of the slave clock (540); (d) sending a message from the resource to the controller via the network to request the value saved for the master clock (545); (e) sending the value saved for the master clock from the controller to the resource via the network (560); (f) receiving the value saved for the master clock at the resource (565); (g) saving a second value of the slave clock in the resource (570); (h) subtracting the first value from the second value to determine a slave clock difference value (575); and (i) adding the difference value to the value saved for the master clock to determine a synchronized value (580) for the slave clock and setting the slave clock to the synchronized value (585).

Claim 14 adds the features of the document processing system including a plurality of resources 12, 14, 16, 18, each resource further including a slave clock related to operational timing of the resource, and the electrical interconnections further connecting each resource to the controller via the control bus and the network, wherein steps (c) through (i) are performed for each resource.

As shown in FIG. 6 and described on pages 12-13 of the specification, the subject matter of independent claim 15 is directed to a method of synchronizing the slave clock with the master clock during steady state operation of a document processing system, the document processing system comprising a marking engine that marks a sheet to form at least a portion of a document, the marking engine

further including a controller 22, the controller further including a master clock 48, a resource (12, 14, 16, or 18) that transfers the sheet to the marking engine or receives the sheet from the marking engine, the resource further including a slave clock 42 related to operational timing of the resource, and electrical interconnections connecting the resource to the controller, the electrical interconnections further comprising a control bus 36 and a network.

The method of claim 15 comprises the steps of: (a) saving a value of the master clock in the controller (615); (b) generating a discrete clock synchronization interrupt signal in the controller and distributing the discrete clock synchronization interrupt signal to the resource via the control bus (625); (c) receiving the discrete clock synchronization interrupt signal at the resource (630) and saving a value of the slave clock (640); (d) sending a message from the resource to the controller via the network to request the value saved for the master clock (645); (e) sending the value saved for the master clock at the resource via the network (660); (f) receiving the value saved for the master clock at the resource (665); and (g) subtracting the value saved for the slave clock from the value saved for the master clock to determine an error value between the slave clock and the master clock (690) and using the error value in an adjustment algorithm to adjust the slave clock to be synchronized with the master clock (695).

Claim 16 adds the feature of step (g) resulting in synchronization of the slave clock to within one (1) clock cycle of the master clock.

Claim 17 adds the feature of steps (a) through (g) being performed periodically during steady state operation of the document processing system.

Claim 18 adds the feature of the periodic interval for performing steps (a) through (g) during steady state operation of the document processing system is about two seconds.

Claim 19 adds the features of the document processing system including a plurality of resources 12, 14, 16, 18, each resource further including a slave clock 42 related to operational timing of the resource, and the electrical interconnections further connecting each resource to the controller via the control bus and the network, wherein steps (c) through (g) are performed for each resource.

Claim 20 adds the feature of step g) results in synchronization of each slave clock to within one (1) clock cycle of the master clock.

As shown in FIGS. 1-4 and described on pages 8-11 of the specification, the subject matter of independent claim 21 is directed to an electrophotographic document processing system, operated in a xerographic environment. The electrophotographic document processing system comprises a marking engine 10 that marks a sheet to form at least a portion of a document, the marking engine including a controller 22, the controller including a master clock 48 and logic for generating a discrete clock synchronization interrupt signal; a plurality of resources 12, 14, 16, 18, each resource is associated with transfer of the sheet to the marking engine or receipt of the sheet from the marking engine, each resource including a slave clock 42 related to operational timing of the resource and logic for receiving the discrete clock synchronization interrupt signal, processing the discrete clock synchronization interrupt signal, processing the discrete clock synchronization interrupt signal, and synchronizing the slave clock with the master clock; and electrical wiring interconnecting the resources and the controller for distributing the discrete clock synchronization interrupt signal to the resources.

#### VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

The following grounds of rejection are presented for review on appeal:

Claims 1, 3, 6, 7, 10, 11, and 21 stand rejected under 35 USC § 103(a) for obviousness over U.S. Patent No. 5,995,771 to Miyawaki in view of U.S. Patent No. 4,807,259 to Yamanaka et al. (Yamanaka).

Claim 2 stands rejected under 35 USC § 103(a) for obviousness over Miyawaki in view of Yamanaka and further in view of U.S. Patent No. 6,675,249 to Shimoda et al. (Shimoda).

Claims 4 and 8 stand rejected under 35 USC § 103(a) as being unpatentable over Miyawaki in view of Yamanaka and further in view of U.S. Patent No. 6,343,351 to Lackman et al. (Lackman).

Claim 12 stands rejected under 35 USC § 103(a) as being unpatentable over Miyawaki in view of Yamanaka and further in view U.S. Patent No. 6,704,302 to Einbinder et al. (Eindbinder).

Claims 5, 9, and 13-20 stand rejected under 35 USC § 103(a) as obvious over Miyawaki in view of Yamanaka and further in view of U.S. Patent No. 5,535,217 to Cheung et al. (Cheung).

The Examiner has made the above rejections final.

#### VII. ARGUMENT

A. Rejection of Claims 1-21 and Finality of Rejection Does Not Provide Appellants With Fair Opportunity to Identify the Issues and Reply Because Examiner Has Not Properly Communicated the Basis for Rejection.

The Examiner rejected claims 1-21 under 35 USC § 103(a) for obviousness over various combinations of references in the Office Action of November 30, 2004 and made these rejections final. Appellants challenge the finality of these rejections because: i) the Examiner failed to properly communicate the basis for rejection of the claims so that the issues could be identified as required by MPEP § 706.02(j), ii) the Examiner did not fully and clearly state the ground for rejection as required by MPEP § 707.07(d), and iii) the Examiner did not designate the particular parts of references that are relied upon for rejection of each claim individually as required by 37 CFR 1.104(c).

For example, according to paragraph 6 of the Office Action, the Examiner rejected independent claim 21 under 35 USC § 103(a) for obviousness over Miyawaki in view of Yamanaka. Then, at paragraph 13, the Office Action refers to findings 4.2, 4.9, and 4.10 as to rejection of claim 21. Paragraph 4 includes paragraphs 4.1-4.41, which are fact findings for support of all rejections in the Office Action. In fact findings 4.2, 4.9, and 4.10, the Examiner identifies certain items that are disclosed in Yamanaka with column, line, and drawing references. Notably, the Examiner's rejection of claim 21 for obviousness over the combination of Miyawaki and Yamanaka is not clearly tied to any specific fact findings from Miyawaki.

In a telephone interview with the Examiner on December 29, 2004, the use of fact findings from Miyawaki in rejection of claim 21 was discussed with Appellants' patent counsel. The Examiner explained that any of the Miyawaki fact findings (i.e., 4.38 - 4.41) that are relevant to claim 21 are also relied upon to support rejection of the claim in addition to the Yamanka findings specifically identified in paragraph 13.

The Examiner further explained that any fact findings (i.e., 4.1 through 4.41) that are relevant to any particular claim are relied upon to support rejection of that claim. The specific findings referred to by the Examiner in paragraphs 6 through 31 are not necessarily the only findings that support the rejections.

Initially, appellants were confused as to which specific fact findings supported rejection of certain claims, particularly where rejection was based on a reference without identifying any specific fact findings associated with that reference. After the December 29 telephone interview, it was apparent that the Examiner forced appellants to guess which fact findings (i.e., 4.1 - 4.41) are relied upon for rejection of each claim in order to properly frame an argument to support allowance of the claim. The Examiner's Office Action did not designate the particular parts of the references relied upon for rejection of the claims and, therefore, did not provide fully and clearly stated grounds for the rejections. This does not give appellants a fair opportunity to reply to the rejections. Based on the foregoing, it was unfair to appellants that the Office Action was made final. Accordingly, appellants respectfully request reconsideration and withdrawal of the finality of the rejection of claims 1-21.

B. Rejection of Claims 1-21 is Improper Because Examiner Has Not Properly Established Some Suggestion or Motivation to Combine Miyawaki and Yamanaka.

The Examiner has rejected: i) claims 1, 3, 6, 7, 10, 11, and 21 under 35 USC § 103(a) for obviousness over the combination of Miyawaki and Yamanaka, ii) claim 2 under 35 USC § 103(a) for obviousness over the combination of Miyawaki, Yamanaka, and Shimoda, iii) claims 4 and 8 under 35 USC § 103(a) for obviousness over the combination of Miyawaki, Yamanaka, and Lackman, iv) claim 12 under 35 USC § 103(a) for obviousness over the combination of Miyawaki, Yamanaka, and

Einbinder, and v) claims 5, 9, and 13-20 under 35 USC § 103(a) for obviousness over the combination of Miyawaki, Yamanaka, and Cheung.

The Examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness (MPEP § 2142). To establish a prima facie case of obviousness, inter alia, there must be some suggestion or motivation, either in the references themselves or in the art, to modify the reference or to combine reference teachings (MPEP § 2143). There are three possible sources for a motivation to combine references: i) the nature of the problem to be solved, ii) the teachings of the prior art, and iii) the knowledge of persons of ordinary skill in the art. *In re Rouffet*, 149 F.3d 1350, 1357 (Fed.Cir. 1998); MPEP § 2143.01. Obviousness can be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art (MPEP § 2143.01). The Examiner has identified explicit motivation to combine Miyawaki and Yamanaka for claims 1-21 in the Office Action.

As to claim 1, the Examiner points out that Miyawaki did not discuss the details of synchronization between the controller of the marking engine and the resource (para. 7, page 8). In fact, Miyawaki has nothing to do with clock synchronization nor is it ever mentioned in the patent. In FIG. 3 of Miyawaki there is shown an interrupt signal between a CPU and a copy controller, but this is not even discussed in any way. It is not even numbered such that it could be referred to in the specification. It appears that this is nothing more than an interrupt signal between processors contained on the same printed wiring board. This is extremely common in the electronics industry and one would be hard pressed to find a CPU that does not have some kind of interrupt wired to it. Again, this signal does not go

between modules nor does Miyawaki even mention synchronization of clocks. It does talk about an image forming apparatus, which appellants also talk about, but that is where the similarities end. Miyawaki most closely refers to a concept that is called "cluster printing" where there are multiple printers that a job can be scheduled to and the user picks the most available printer within a cluster of printers. Miyawaki does connect the "service terminal" to the printers (which is referred to as "copiers" in the patent) via a LAN but that is where the similarities end.

Therefore, in order for the Examiner to establish a prima facie case of obviousness for claim 1, Yamanaka must disclose the details of synchronization that are not discussed in Miyawaki and the Examiner must be identify a suggestion or motivation to combine the synchronization teachings of Yamanaka with the document processing system teachings of Miyawaki.

According to the Office Action, the Examiner found explicit motivation to combine Miyawaki and Yamanaka in Yamanaka, stating that "one of ordinary skill in the art would have been motivated to make such a combination in order to provide a way to synchronize operations for practical use [finding 4.18]" (para. 7, page 8). Finding 4.18 states that "Yamanaka teaches the advantage of synchronizing the master and slave clocks within a range of error in order to avoid problems for practical use [col. 1, II. 56-59]." Col. 1, lines 56-59 in the Background of the Invention section of Yamanaka states "in the time synchronization as described above, it is important that the clock circuits of the master and slave stations are synchronized within a range of error that does not result in a problem for practical use." Apparently this explicit motivation to combine Miyawaki and Yamanaka also applies to claims 2-21. During the December 29 telephone interview, the Examiner stated that Yamanaka continues to be viewed as disclosing a document processing system.

Yamanaka is a solution based solely on a serial communications channel. It measures the round trip delay and attempts to adjust for the delay. The problem with this approach is that the delay is not symmetrical nor is it consistent. With this approach there will be inherent inaccuracies based on the amount of message traffic on the serial communications channel. This differs from the embodiments disclosed in the present application in that appellants use a discrete signal that all the processors receive simultaneously. This removes the delay and consequently any notion of having to adjust for it.

More particularly, Yamanaka discloses several embodiments of a data transmission and receiving system in the form of a Supervisory Control and Data Acquisition (SCADA) system that includes a master station 1 in communication with multiple remote slave stations 2, 3 (FIGs. 1, 3A, 3B, 5A, 5B). The master station serves as a control station and the slave stations provide input circuits 24, 34 and output circuits 25, 35 for two-way data transmissions to/from, for example, electrical power generating facilities, power transmission facilities, or power substation facilities of various electrical stations located within a broad region (Abstract; col. 1, lines 7-21; col. 2, lines 29-39). In this electrical station example, the master station monitors the facilities via the input circuits of the slave stations and controls the facilities via the output circuits. Various status changes of the data transmission system, such as status changes of input circuits, are detected and the time at which the status change is detected, as well as pertinent address and status information, is stored in memory (not shown) and communicated to the CPU 10 of the master station for storage, display, and printing (col. 2, line 63 - col. 3, line 31). The master clock 17 of the master station and/or the slave clocks 27, 37 of the slave stations provide the time information that is stored with status changes. As such, the master clock and slave clocks are synchronized so that status changes across the system can be arranged in a manner that is based on the time information (col. 10, lines 31-36).

Apparently, the Examiner views the typewriter 13 and associated components of Yamanaka as a document processing system (FIGs. 1, 3A, and 5A). The CPU 10 records status changes of the slave stations 2 or 3 by operating the typewriter through the typewriter control circuit 16 (col. 3, lines 27-31). When a status change occurs, times of the slave clocks are also transmitted to the master station 1. For example, if a status change occurs at the contact being inputted to the input circuit 25 of the first slave station 2, CPU 20 transmits the time of the slave clock 27 to the master station 1 together with the address number of the relevant contact and the new status. The CPU 10 of the master station 1 stores such data to memory (not shown) and arranges the data in sequence of time added acquisition of data from other slave stations during a constant period and then outputs such data to the typewriter 13 through the typewriter control circuit 16 (col. 10, lines 24-36). Notably, neither the master nor the slave clocks synchronize or control operation of the CPU 10, typewriter 13, or typewriter controller 16 which the Examiner has construed as forming a document processing system.

Based on the foregoing, the explicit motivation to combine Miyawaki and Yamanaka identified by the Examiner (i.e., "one of ordinary skill in the art would have been motivated to make such a combination in order to provide a way to synchronize operations for practical use") simply does not support combining any form of master/slave clock synchronization taught by Yamanaka with operation of any document processing system that may be taught by either Miyawaki or Yamanka. In particular, this does not properly provide some suggestion or motivation to combine the master/slave clock synchronization taught by Yamanaka with operations of any controller of a marking engine and an associated resource

that may be taught by Miyawaki. Therefore, appellants respectfully submit that the obviousness rejections of claims 1-21 are improper because the Examiner has not properly established some suggestion or motivation to combine Miyawaki and Yamanaka. Accordingly, appellants respectfully request that the obviousness rejections of claims 1-21 be withdrawn. Under such circumstances, appellants respectfully submit that claims 1-21 are currently in condition for allowance.

C. In the Alternative, Claims 1, 3, 6, 7, 10, 11, and 21 Patentably Distinguish Over the Combination of Miyawaki and Yamanaka.

As to the rejection of independent claim 1 for obviousness over the combination of Miyawaki and Yamanaka, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki) and findings 4.1-4.4 and 4.18 (Yamanaka). As to dependent claim 3, the Examiner has specifically identified finding 4.5 (Yamanaka). For dependent claim 6, the Examiner has specifically identified findings 4.6 and 4.7 (Yamanaka). As to dependent claim 7, the Examiner has specifically identified finding 4.8 (Yamanaka). For dependent claim 10, the Examiner has specifically identified finding 4.11 (Yamanaka). As to dependent claim 11, the Examiner has specifically identified finding 4.12 (Yamanaka).

In support of the rejection of claim 1, the Examiner states that "Miyawaki discloses the system comprising a control bus [system bus 18], interconnecting the resource and controller [col. 4, II. 8-11, II. 35-39]" (finding 4.41). Appellants respectfully disagree. As shown in FIG. 2, the Miyawaki system bus 18 interconnects a CPU 11 with various other components (e.g., serial communication control unit(s) 16) within the copier controller 31 and with an interface 17 within the copier 1. Notably, the serial communication control units 16 provide the copier controller 31 with an interface to other equipment resources (e.g., operation panel, document feeder, finisher, and the like) (col. 4, lines 8-11). Therefore, the Miyawaki

system bus 18 is not "interconnecting the resource and the controller" as recited in claim 1.

In further support of the rejection of claim 1, the Examiner states that: i) "Yamanaka discloses a system comprising a controller, resource, and control bus with the synchronization details" (para. 7, page 8), ii) "Yamanaka discloses the system comprises a resource [slave station 2], including a slave clock [27] related to operational timing of the resource [slave station utilizes a slave clock to provide timing functionality to slave station components such as CPU 20 which inherently, requires a local timing input] and circuitry for receiving and processing the discreet clock synchronization interrupt signal [code sensing and receiving circuit 28 and CPU 20; col. 3, II. 5-11; col. 7, II. 12-17]" (finding 4.3) and iii) "Yamanaka discloses the system comprises a control bus [data transmission path 5], interconnecting the resource and the controller, for distribution the discrete interrupt signal [col. 2, II. 25-28; col. 4, II. 20-22]" (finding 4.4). Appellants respectfully disagree.

In general, Yamanaka discloses several embodiments of a data transmission and receiving system in the form of a Supervisory Control and Data Acquisition (SCADA) system that includes a master station 1 in communication with multiple remote slave stations 2, 3 (FIGs. 1, 3A, 3B, 5A, 5B). The master station serves as a control station and the slave stations provide input circuits 24, 34 and output circuits 25, 35 for two-way data transmissions to/from, for example, electrical power generating facilities, power transmission facilities, or power substation facilities of various electrical stations located within a broad region (Abstract; col. 1, lines 7-21; col. 2, lines 29-39). In this electrical station example, the master station monitors the facilities via the input circuits of the slave stations and controls the facilities via the output circuits. Various status changes of the data transmission system, such as status changes of input circuits, are detected and the time at which the status

change is detected, as well as pertinent address and status information, is stored in memory (not shown) and communicated to the CPU 10 of the master station for storage, display, and printing (col. 2, line 63 – col. 3, line 31). The master clock 17 of the master station and/or the slave clocks 27, 37 of the slave stations provide the time information that is stored with status changes. As such, the master clock and slave clocks are synchronized so that status changes across the system can be arranged in a manner that is based on the time information (col. 10, lines 31-36).

Apparently, the Examiner views the typewriter 13 and associated components of Yamanaka as a document processing system (FIGs. 1, 3A, and 5A). The CPU 10 records status changes of the slave stations 2 or 3 by operating the typewriter through the typewriter control circuit 16 (col. 3, lines 27-31). When a status change occurs, times of the slave clocks are also transmitted to the master station 1. For example, if a status change occurs at the contact being inputted to the input circuit 25 of the first slave station 2, CPU 20 transmits the time of the slave clock 27 to the master station 1 together with the address number of the relevant contact and the new status. The CPU 10 of the master station 1 stores such data to memory (not shown) and arranges the data in sequence of time added acquisition of data from other slave stations during a constant period and then outputs such data to the typewriter 13 through the typewriter control circuit 16 (col. 10, lines 24-36).

Notably, neither the master nor the slave clocks synchronize or control operation of the CPU 10, typewriter 13, or typewriter controller 16 which the Examiner has construed as forming a document processing system. Moreover, the slave station 2 is not "a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine" as recited in claim 1. Therefore, Yamanaka does not disclose a "resource" having the characteristics alleged by the Examiner in para. 7 and in finding 4.3. As such, the Yamanaka data transmission

path 5 is not interconnecting "a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine" and the controller as recited in claim 1. Therefore, Yamanaka does not disclose a "control bus" having the characteristics alleged in para. 7 and in finding 4.4. Accordingly, based on the foregoing, appellants respectfully submit that claim 1 and claims dependent thereon (including claims 3, 6, 7, 10, and 11) are currently in condition for allowance on these alternative grounds.

As to the rejection of independent claim 21 for obviousness over the combination of Miyawaki and Yamanaka, the Examiner has specifically identified findings 4.2, 4.9, and 4.10 (Yamanaka). In support of the rejection of claim 21, the Examiner states that: i) "Yamanaka discloses the system comprises a plurality of resources [slave stations 2 and 3], each resource including a slave clock [27 and 37] related to operational timing of the resource and logic for receiving the discrete interrupt signal [code sending and receiving circuit 28 and 38], processing the discrete interrupt signal [CPU 20 and 30], and synchronizing the slave clock with the master clock [col. 7, II. 42-47] (finding 4.9) and ii) "Yamanaka discloses the system comprises electrical wiring [data transmission path 5] interconnecting the resources and the controller for distributing the discrete interrupt signal to the resources [col. 2, II. 25-28; col. 4, II. 20-22] (finding 4.10). Appellants respectfully disagree.

First, the Examiner has not specifically identified any reference that discloses or fairly suggests the "marking engine" element of claim 21. Additionally, as discussed above in the arguments that distinguish claim 1 from findings 4.3 and 4.4, neither the master nor the slave clocks in Yamanaka synchronize or control operation of the CPU 10, typewriter 13, or typewriter controller 16 which the Examiner has construed as forming a document processing system. Moreover, the slave stations 2, 3 are not resources that are "associated with transfer of the sheet

to the marking engine or receipt of the sheet from the marking engine" as recited in claim 21. Therefore, Yamanaka does not disclose a "resource" having the characteristics alleged by the Examiner in finding 4.9. As such, the Yamanaka data transmission path 5 is not interconnecting "resources associated with transfer of the sheet to the marking engine or receipt of the sheet from the marking engine" and the controller as recited in claim 21. Accordingly, based on the foregoing, appellants respectfully submit that claim 21 is currently in condition for allowance on these alternative grounds.

D. In the Alternative, Claim 2 Patentably Distinguishes Over the Combination of Miyawaki, Yamanaka, and Shimoda.

As to the rejection of claim 2 for obviousness over the combination of Miyawaki, Yamanaka, and Shimoda, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.4 (Yamanaka), and 4.33 (Shimoda). Appellants respectfully disagree at least as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4. Accordingly, appellants respectfully submit that claim 2 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Shimoda on these additional grounds.

E. In the Alternative, Claims 4 and 8 Patentably Distinguish Over the Combination of Miyawaki, Yamanaka, and Lackman.

As to rejection of claim 4 for obviousness over the combination of Miyawaki, Yamanaka, and Lackman, the Examiner has specifically identified findings 4.5 (Yamanaka) and 4.34 and 4.35 (Lackman). Appellants respectfully disagree at least as to finding 4.5. In finding 4.5, the Examiner states "Yamanaka discloses the resource circuitry includes a processor [CPU 20] for adjusting the slave clock to provide for compatibility with the controller [col. 7, II. 42-47]."

As discussed above in the arguments that distinguish claim 1 from findings 4.3 and 4.4, neither the master nor the slave clocks in Yamanaka synchronize or control operation of the CPU 10, typewriter 13, or typewriter controller 16 which the Examiner has construed as forming a document processing system. Moreover, the slave station 2 is not "a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine" as recited in claim 1. Claim 4 depends from claims 1 and 3. Therefore, Yamanaka does not disclose a "resource circuitry" having the characteristics alleged by the Examiner in finding 4.5. As such, the Yamanaka CPU 20 does not provide "compatibility between the resource and controller" as recited in claim 4. Accordingly, based on the foregoing, appellants respectfully submit that claim 4 is currently in condition for allowance in view of Miyawaki, Yamanaka, and Lackman on these alternative grounds.

As to the rejection of claim 8 for obviousness over the combination of Miyawaki, Yamanaka, and Lackman, the Examiner has specifically identified findings 4.8 and 4.13 (Yamanaka) and 4.34 and 4.35 (Lackman). Appellants respectfully disagree at least as to findings 4.8 and 4.13. In finding 4.8, the Examiner states "Yamanaka discloses the circuitry in each resource includes a processor [CPU 20 and 30] for adjusting the slave clock associated with the resource to provide for compatibility with the controller [col. 7, II. 42-47]." In finding 4.13, the Examiner states "Yamanaka discloses a document processing system comprising a plurality of resources [slave stations 2 and 3] [col. 7, II. 3-5]."

As discussed above in the arguments that distinguish claim 1 from findings 4.3 and 4.4, neither the master nor the slave clocks in Yamanaka synchronize or control operation of the CPU 10, typewriter 13, or typewriter controller 16 which the Examiner has construed as forming a document processing system. Moreover, none of the slave stations 2, 3 are "a resource that transfers the sheet to the

marking engine or receives the sheet from the marking engine" as recited in claim 1. Claim 4 depends from claims 1, 6, and 7. Therefore, Yamanaka does not disclose "circuitry in each resource" having the characteristics alleged by the Examiner in finding 4.8. As such, the CPUs 20, 30 in the Yamanaka slave stations 2, 3 do not provide "compatibility between the resource and controller" as recited in claim 8. Furthermore, Yamanaka does not disclose "resources" having the characteristics alleged in finding 4.13.

Moreover, Lackman deals with accessing a disk. It has nothing to do with synchronizing clocks between modules.

Accordingly, based on the foregoing, appellants respectfully submit that claim 8 is currently in condition for allowance in view of Miyawaki, Yamanaka, and Lackman on these alternative grounds.

F. In the Alternative, Claim 12 Patentably Distinguishes Over the Combination of Miyawaki, Yamanaka, and Einbinder.

As to rejection of claim 12 for obviousness over the combination of Miyawaki, Yamanaka, and Einbinder, the Examiner has specifically identified findings 4.6 and 4.7 (Yamanaka) and 4.36 (Einbinder). Appellants respectfully disagree at least as to findings 4.6 and 4.7. In finding 4.6, the Examiner states "Yamanaka discloses the system includes a plurality of resources [slave stations 2 and 3], each resource including a slave clock [27 and 37] related to operational timing of the resource and circuitry for receiving and processing the clock synchronization interrupt signal [code sending and receiving circuit 28 and 38, CPU 20 and 30]." In finding 4.7, the Examiner states "Yamanaka discloses the control bus [data transmission path 5], interconnects each resource with the controller thereby distributing the interrupt signal to each resource [col. 2, II. 25-28; col. 4, II. 20-22]."

As discussed above in the arguments that distinguish claim 1 from findings 4.3 and 4.4, neither the master nor the slave clocks in Yamanaka synchronize or control operation of the CPU 10, typewriter 13, or typewriter controller 16 which the Examiner has construed as forming a document processing system. Moreover, neither of the slave stations 2, 3 are "a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine" as recited in claim 1. Claim 12 depends from claims 1 and 6. Therefore, Yamanaka does not disclose any "resources" having the characteristics alleged by the Examiner in finding 4.6. As such, the Yamanaka data transmission path 5 is not "interconnecting the resources and the controller" as recited in claim 12. Therefore, Yamanaka does not disclose a "control bus" having the characteristics alleged by the Examiner in finding 4.7.

Moreover, Einbinder deals with prioritizing which device can be accessed from the other devices that are connected. Einbinder does discuss doing this over a LAN (local area network) but never discusses anything about clock synchronization.

Accordingly, based on the foregoing, appellants respectfully submit that claim 12 is currently in condition for allowance in view of Miyawaki, Yamanaka, and Einbinder on these alternative grounds.

G. In the Alternative, Claims 5 and 9 Patentably Distinguish Over the Combination of Miyawaki, Yamanaka, and Cheung.

As to rejection of claim 5 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.5 and 4.18 (Yamanaka), and 4.19 and 4.21 (Cheung). Claim 5 depends from claims 1 and 3. Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4 and ii) as to finding 4.5 for the same reasons

provided above that distinguish claim 4 from finding 4.5. Appellants also respectfully disagree at least as to finding 4.21.

In finding 4.21, the Examiner states "Cheung discloses the compatibility between the resource and the controller is such that the slave clock is synchronized to within one clock cycle of the master clock [col. 4, II. 37-41; set the precision values such as Q and restrict the transmission times appropriately]." Col. 4, II. 37-41 of Cheung reads as follows:

"In summary, given the above sequence of messages, a single round trip according to the PCS scheme produces, for Process A, a new time U+(V-T)/2 plus or minus a precision of Q+(V-T)/2. The endpoints of this new interval, as of the present time, are U-Q and U+Q+V-T."

This portion of Cheung does not disclose or fairly suggest that "the slave clock is synchronized to within one (1) clock cycle of the master clock" as recited in claim 5. Therefore, Cheung does not disclose clock synchronization in the manner alleged by finding 4.21. Indeed, Cheung is a scheme that utilizes mathematics to better estimate what the average or best round trip time would be on a network. It is not based on having a separate discrete wire that is used to synchronize the processors. Again, the inherent delay because of message traffic applies.

Accordingly, based on the foregoing, appellants respectfully submit that claim 5 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to rejection of claim 9 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.5, 4.8, 4.13, and 4.18 (Yamanaka), and 4.19 and 4.21 (Cheung). Claim 9 depends from claims 1, 6, and 7. Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4, ii) as to finding 4.5 for the same reasons provided above that distinguish claim 4 from findings 4.5, iii) as to findings

4.8 and 4.13 for the same reasons provided above that distinguish claim 8 from findings 4.8 and 4.13, and iv) as to finding 4.21 for the same reasons provided above that distinguish claim 5 from finding 4.21. Accordingly, based on the foregoing, appellants respectfully submit that claim 9 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

# H. In the Alternative, Claims 13-20 Patentably Distinguish Over the Combination of Miyawaki, Yamanaka, and Cheung.

As to rejection of independent claim 13 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.4 and 4.13-4.17 (Yamanaka), and 4.19, 4.22-4.29, and 4.32 (Cheung). Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4 and ii) as to finding 4.13 for the same reasons provided above that distinguish claim 8 from finding 4.13. Appellants also respectfully disagree at least as to findings 4.16, 4.17, and 4.24-4.29.

First, in findings 4.16 and 4.17, the Examiner states the Yamanaka discloses certain operations involving the "resource." For example, finding 4.16 states that "Yamanaka discloses the method comprising generating a discrete clock synchronization interrupt signal in the controller and distributing the discrete interrupt signal to the resource via the control bus." However, as described above in distinguishing claim 1 from findings 4.3 and 4.4, Yamanaka does not disclose or fairly suggest operation of "a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine" as recited in claim 13. Therefore, Yamanaka does not disclose a "resource" having the characteristics alleged by findings 4.16 and 4.17.

Moreover, in findings 4.24-4.29, the Examiner states the Cheung discloses certain operations involving the "resource." For example, finding 4.24 states that "Cheung discloses the method comprising sending a message from the resource to the controller via the network to request the value [time U] saved for the master clock." However, Cheung does not disclose or fairly suggest operation of "a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine" as recited in claim 13. Therefore, Cheung does not disclose a "resource" having the characteristics alleged by findings 4.24-4.29.

Furthermore, in finding 4.24, the Examiner states "Cheung discloses the method comprising sending a message from the resource to the controller via the network to request the value [time U] saved for the master clock [col. 2, II. 66-67; col. 4, II. 8-10]. Col. 2, lines 66-67 of Cheung reads as follows:

"A slave node sends a synchronization request at a time t, according to its clock."

Col. 4, lines 7-11 of Cheung reads as follows:

"Next, Process A sends a message (4) to Process B, which receives the message some time later. Process B then obtains a time from its local clock, of a time U, plus or minus a precision Q (6)."

Notably, Cheung discloses that Process B obtains a time from its local clock after it receives a message from Process A. Claim 13 recites "a) saving a value of the master clock in the controller" and "d) sending a message from the resource to the controller via the network to request the value saved for the master clock." Claim 13 is distinguished from the portion of Cheung cited by the Examiner because Process B (relating to the controller) does not save a value of its clock until after it receives the message from Process A (allegedly relating to the resource). In the claim, the value of the master clock in the controller is saved in a) and the value that was saved earlier is requested in d). Therefore, Cheung does not disclose the method alleged by finding 4.24.

Additionally, in finding 4.29, the Examiner states "Cheung discloses the method comprising adding the difference value [V-T] to the value saved for the master clock [U] to determine a synchronized value [col. 4, II. 37-41; Q=0]. Col. 4, lines 37-41 of Cheung reads as follows:

"In summary, given the above sequence of messages, a single round trip according to the PCS scheme produces, for Process A, a new time U+(V-T)/2 plus or minus a precision Q+(V-T)/2. The endpoints of this new time interval, as of the present time, are U-Q and U+Q+V-T."

Notably, Cheung discloses: i) subtracting a first value (T) for a slave clock from a second value (V) for the slave clock, dividing the first result by two (2), and adding the second result to a value (U) for a master clock to determine a synchronized value for the slave clock. This appears to be based on saving the master clock value (U) between the first and second slave clock values (T, V) because the delay between the master and slave clocks is averaged. In contrast, claim 13 recites "h) subtracting the first value from the second value to determine a slave clock difference value; and i) adding the difference value to the value saved for the master clock to determine a synchronized value for the slave clock and setting the slave clock to the synchronized value." Notably, Cheung teaches dividing the difference between first and second slave clock values by two (2) which is not required in the claimed method. Therefore, Cheung does not disclose the method alleged by finding 4.29.

Accordingly, based on the foregoing, appellants respectfully submit that claim 13 and claims dependent thereon (i.e., claim 14) are currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to the rejection of claim 14 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.4 and 4.13-4.17 (Yamanaka), and 4.19, 4.22-4.29, and

4.32 (Cheung). Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4, ii) as to finding 4.13 for the same reasons provided above that distinguish claim 8 from finding 4.13, iii) as to findings 4.16 and 4.17 for the same reasons provided above that distinguish claim 13 from findings 4.16 and 4.17, and iv) as to findings 4.19 and 4.24-4.29 for the same reasons provided above that distinguish claim 13 from findings 4.19 and 4.24-4.29. Accordingly, based on the foregoing, appellants respectfully submit that claim 14 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to the rejection of claim 15 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.2-4.4 and 4.13-4.17 (Yamanaka) and 4.19, 4.22-4.26, 4.30, and 4.32 (Cheung). Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4, ii) as to finding 4.13 for the same reasons provided above that distinguish claim 8 from finding 4.13, iii) as to findings 4.16 and 4.17 for the same reasons provided above that distinguish claim 13 from findings 4.16 and 4.17, and iv) as to findings 4.19 and 4.24-4.26 for the same reasons provided above that distinguish claim 13 from findings 4.19 and 4.24-4.26. Appellants also respectfully disagree at least as to finding 4.30.

In finding 4.30, the Examiner states "Cheung discloses the method comprising subtracting the value saved for the slave clock [time T] from the value saved for the master clock [time U] to determine an error value between the slave clock and the master clock [U-T] and using the error value in an adjustment algorithm to adjust the slave clock to be synchronized with the master clock [col. 4,

II. 37-41; utilize V and Q in algorithm]. Col. 4, lines 37-41 of Cheung reads as follows:

"In summary, given the above sequence of messages, a single round trip according to the PCS scheme produces, for Process A, a new time U+(V-T)/2 plus or minus a precision Q+(V-T)/2. The endpoints of this new time interval, as of the present time, are U-Q and U+Q+V-T."

Notably, Cheung discloses: i) subtracting a first value (T) for a slave clock from a second value (V) for the slave clock, dividing the first result by two (2), and adding the second result to a value (U) for a master clock to determine a synchronized value for the slave clock. This appears to be based on saving the master clock value (U) between the first and second slave clock values (T, V) because the delay between the master and slave clocks is averaged. In contrast, claim 15 recites "g) subtracting the value saved for the slave clock from the value saved for the master clock to determine an error value between the slave clock and the master clock and using the error value in an adjustment algorithm to adjust the slave clock to be synchronized with the master clock." Notably, Cheung teaches dividing the difference between first and second slave clock values by two (2) which is not required in the claimed method. Therefore, Cheung does not disclose the method alleged by finding 4.30.

Accordingly, based on the foregoing, appellants respectfully submit that claim 15 and claims dependent thereon (i.e., claims 16-20) are currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to the rejection of claim 16 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.5 and 4.18 (Yamanaka), and 4.19 and 4.21 (Cheung). Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and

4.4, ii) as to finding 4.5 for the same reasons provided above that distinguish claim 4 from finding 4.5, iii) as to finding 4.19 for the same reasons provided above that distinguish claim 13 from finding 4.19, and iv) as to finding 4.21 for the same reasons provided above that distinguish claim 5 from finding 4.21. Accordingly, based on the foregoing, appellants respectfully submit that claim 16 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to the rejection of claim 18 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified finding 4.31 (Cheung). Appellants respectfully disagree.

In finding 4.31, the Examiner states "Cheung discloses the method wherein the periodic interval for performing the steps [a through g in application] during steady state operation of the document processing system is about two seconds [col. 4, II. 37-41; with Q=0 and ignoring calculation time assumed to be insignificant, focus on the more significant transmission time if that be the case so that the algorithm involving Q, V, and T would yield 2]. Col. 4, lines 37-41 of Cheung reads as follows:

"In summary, given the above sequence of messages, a single round trip according to the PCS scheme produces, for Process A, a new time U+(V-T)/2 plus or minus a precision Q+(V-T)/2. The endpoints of this new time interval, as of the present time, are U-Q and U+Q+V-T."

Notably, Cheung discloses: i) subtracting a first value (T) for a slave clock from a second value (V) for the slave clock, dividing the first result by two (2), and adding the second result to a value (U) for a master clock to determine a synchronized value for the slave clock. This appears to be based on saving the master clock value (U) between the first and second slave clock values (T, V) because the delay between the master and slave clocks is averaged. In contrast, claim 18 recites "wherein the periodic interval for performing steps a) through g)

during steady state operation of the document processing system is about two seconds." Notably, Cheung teaches dividing the difference between first and second slave clock values by two (2) which is not required in the claimed method. Therefore, Cheung does not disclose the method alleged by finding 4.31.

Accordingly, based on the foregoing, appellants respectfully submit that claim 18 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to the rejection of claim 19 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.4 and 4.13-4.17 (Yamanaka), and 4.19, 4.22-4.29, and 4.32 (Cheung). Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41, 4.3, and 4.4, ii) as to finding 4.13 for the same reasons provided above that distinguish claim 8 from finding 4.13, iii) as to findings 4.16 and 4.17 for the same reasons provided above that distinguish claim 13 from findings 4.16 and 4.17, iv) as to findings 4.19 and 4.24-4.29 for the same reasons provided above that distinguish claim 13 from findings 4.32 for the same reasons provided above that distinguish claim 13 from finding 4.32. Accordingly, based on the foregoing, appellants respectfully submit that claim 19 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

As to the rejection of claim 20 for obviousness over the combination of Miyawaki, Yamanaka, and Cheung, the Examiner has specifically identified findings 4.38-4.41 (Miyawaki), 4.1-4.5, 4.8, 4.13, and 4.18 (Yamanaka), and 4.19 and 4.21 (Cheung). Appellants respectfully disagree at least: i) as to findings 4.41, 4.3, and 4.4 for the same reasons provided above that distinguish claim 1 from findings 4.41,

4.3, and 4.4, ii) as to finding 4.5 for the same reasons provided above that distinguish claim 4 from finding 4.5, iii) as to findings 4.8 and 4.13 for the same reasons provided above that distinguish claim 8 from findings 4.8 and 4.13, and iv) as to finding 4.21 for the same reasons provided above that distinguish claim 5 from finding 4.21. Accordingly, based on the foregoing, appellants respectfully submit that claim 20 is currently in condition for allowance in view of the combination of Miyawaki, Yamanaka, and Cheung on these additional grounds.

#### VIII. CONCLUSION

For all of the reasons discussed above, it is respectfully submitted that the rejections are in error and that claims 1-21 are in condition for allowance. For all of the above reasons, Appellants respectfully request this Honorable Board to reverse the rejections of claims 1-21.

Respectfully submitted,

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#### **CLAIMS APPENDIX**

#### CLAIMS INVOLVED IN THE APPEAL:

1. (Previously presented) A document processing system comprising:

a marking engine that marks a sheet to form at least a portion of a document, the marking engine including a controller, the controller including a master clock and logic for generating a discrete clock synchronization interrupt signal;

a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine, the resource including a slave clock related to operational timing of the resource and circuitry for receiving and processing the discrete clock synchronization interrupt signal; and

a control bus, interconnecting the resource and the controller, for distributing the discrete clock synchronization interrupt signal.

- 2. (Original) The document processing system of claim 1 wherein the resource circuitry includes a processor for determining the compatibility of the slave clock with the master clock.
- 3. (Original) The document processing system of claim 1 wherein the resource circuitry includes a processor for adjusting the slave clock to provide for compatibility with the controller.
- 4. (Original) The document processing system of claim 3 wherein the compatibility between the resource and the controller provides hard real-time service.
- 5. (Original) The document processing system of claim 3 wherein the compatibility between the resource and the controller is such that the slave clock is synchronized to within one (1) clock cycle of the master clock.
- 6. (Previously presented) The document processing system of claim 1, including a plurality of resources, each resource including a slave clock related to operational timing of the resource and circuitry for receiving and

processing the discreet clock synchronization interrupt signal, and wherein the control bus interconnects each resource with the controller thereby distributing the discreet clock synchronization interrupt signal to each resource.

- 7. (Original) The document processing system of claim 6 wherein the circuitry in each resource includes a processor for adjusting the slave clock associated with the resource to provide for compatibility with the controller.
- 8. (Original) The document processing system of claim 7 wherein the compatibility between the resources and the controller provides hard real-time service.
- 9. (Previously presented) The document processing system of claim 7 wherein the compatibility between the resources and the controller is such that each slave clock is synchronized to within one (1) clock cycle of the master clock.
- 10. (Original) The document processing system of claim 6 wherein the resources include one or more finishing devices.
- 11. (Original) The document processing system of claim 6 wherein the resources include one or more feeding devices.
- 12. (Orginal) The document processing system of claim 6, further including a 10 base T network for interconnecting the resources and the controller.
- 13. (Previously presented) In a document processing system comprising a marking engine that marks a sheet to form at least a portion of a document, the marking engine further including a controller, the controller further including a master clock, a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine, the resource further including a slave clock related to operational timing of the resource, and electrical interconnections connecting the resource to the controller, the electrical interconnections further including a control bus and a network, a method of initially synchronizing the slave clock with the master clock comprising the steps of:

- a) saving a value of the master clock in the controller;
- b) generating a discrete clock synchronization interrupt signal in the controller and distributing the discrete clock synchronization interrupt signal to the resource via the control bus;
- c) receiving the discrete clock synchronization interrupt signal at the resource and saving a first value of the slave clock;
- d) sending a message from the resource to the controller via the network to request the value saved for the master clock;
- e) sending the value saved for the master clock from the controller to the resource via the network;
  - f) receiving the value saved for the master clock at the resource;
  - g) saving a second value of the slave clock in the resource;
- h) subtracting the first value from the second value to determine a slave clock difference value; and
- i) adding the difference value to the value saved for the master clock to determine a synchronized value for the slave clock and setting the slave clock to the synchronized value.
- 14. (Original) The method of claim 13, the document processing system including a plurality of resources, each resource further including a slave clock related to operational timing of the resource, and the electrical interconnections further connecting each resource to the controller via the control bus and the network, wherein steps c) through i) are performed for each resource.
- 15. (Previously presented) In a document processing system comprising a marking engine that marks a sheet to form at least a portion of a document, the marking engine further including a controller, the controller further including a master clock, a resource that transfers the sheet to the marking engine or receives the sheet from the marking engine, the resource further including a slave clock related to operational timing of the resource, and electrical interconnections connecting the resource to the controller, the electrical interconnections further comprising a control bus and a network, a method of synchronizing the slave clock with the master clock during steady state operation of the document processing system comprising the steps of:
  - a) saving a value of the master clock in the controller;

- b) generating a discrete clock synchronization interrupt signal in the controller and distributing the discrete clock synchronization interrupt signal to the resource via the control bus;
- c) receiving the discrete clock synchronization interrupt signal at the resource and saving a value of the slave clock;
- d) sending a message from the resource to the controller via the network to request the value saved for the master clock;
- e) sending the value saved for the master clock from the controller to the resource via the network;
  - f) receiving the value saved for the master clock at the resource; and
- g) subtracting the value saved for the slave clock from the value saved for the master clock to determine an error value between the slave clock and the master clock and using the error value in an adjustment algorithm to adjust the slave clock to be synchronized with the master clock.
- 16. (Original) The method of claim 15 wherein step g) results in synchronization of the slave clock to within one (1) clock cycle of the master clock.
- 17. (Original) The method of claim 15 wherein steps a) through g) are performed periodically during steady state operation of the document processing system.
- 18. (Original) The method of claim 17 wherein the periodic interval for performing steps a) through g) during steady state operation of the document processing system is about two seconds.
- 19. (Original) The method of claim 15, the document processing system including a plurality of resources, each resource further including a slave clock related to operational timing of the resource, and the electrical interconnections further connecting each resource to the controller via the control bus and the network, wherein steps c) through g) are performed for each resource.
- 20. (Original) The method of claim 19 wherein step g) results in synchronization of each slave clock to within one (1) clock cycle of the master clock.

21. (Previously presented) An electrophotographic document processing system, operated in a xerographic environment, comprising:

a marking engine that marks a sheet to form at least a portion of a document, the marking engine including a controller, the controller including a master clock and logic for generating a discrete clock synchronization interrupt signal;

a plurality of resources, each resource is associated with transfer of the sheet to the marking engine or receipt of the sheet from the marking engine, each resource including a slave clock related to operational timing of the resource and logic for receiving the discrete clock synchronization interrupt signal, processing the discrete clock synchronization interrupt signal, and synchronizing the slave clock with the master clock; and

electrical wiring interconnecting the resources and the controller for distributing the discrete clock synchronization interrupt signal to the resources.

## **EVIDENCE APPENDIX**

NONE

## RELATED PROCEEDINGS APPENDIX

NONE